

JUN 10 2015

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

David J. Bradley, Clerk

MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Ramon Lopez-Bucio

Principal

Mexico

A206 426 771

YOB:

1976

Case Number:

M-15- 0943 -M

Timoteo Delgado-Soto

Co-Principal

Mexico

A091 188 176

YOB:

1968

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 8, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Inmar Alexander Ortega-Bran, citizen of El Salvador, and Israel Nava-Mireles, citizen of Mexico, along with seventy-four (74) other undocumented aliens, for a total of seventy-six (76), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,

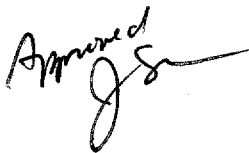
in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 9, 2015, FIT agents received information regarding a suspected stash house located near the intersection of Sugarbird Lane and Hunnybird Lane in Edinburg, TX. The information was received from a smuggled alien who was arrested following a bail out in Willacy County.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No


Sworn to before me and subscribed in my presence,

June 10, 2015

Date

3:56 pm at

Peter E. Ormsby

, U. S. Magistrate Judge

Name and Title of Judicial Officer



Signature of Complainant

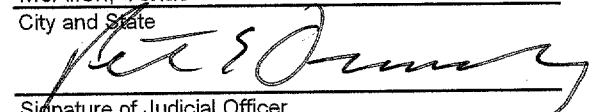
Derek Conrow

Senior Patrol Agent

Printed Name of Complainant

McAllen, Texas

City and State



Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15- 0943 -M

**RE: Ramon Lopez-Bucio
Timoteo Delgado-Soto**

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CONTINUATION:

The individual that agents received the information from identified two trailers at the intersection of Sugarbird Lane and Hunnybird Lane in Edinburg, Texas. The subject told agents he was held in the rear trailer at that location before being moved north. Additionally, the subject told agents there were approximately 100 other illegal aliens inside the trailer when he left.

FIT agents H. Garcia and J. Alvarado set up surveillance on the trailer. At approximately 3:15 p.m., they observed a tan Chevrolet Tahoe arrive and depart shortly after. FIT Agents requested assistance from the Hidalgo County Constables Office in conducting a vehicle stop on the Tahoe. The constable stopped the Tahoe for Changing Lanes When Unsafe.

Agents arrived and interviewed the occupants of the Tahoe. The driver, identified as Ramon LOPEZ-Bucio, was an illegal alien. The passenger, identified as Timoteo DELGADO-Soto, also claimed to be illegally in the United States.

Both Ramon LOPEZ-Bucio and Timoteo DELGADO-Soto were read their Miranda rights at the scene and waived their rights to a lawyer prior to speaking to agents.

LOPEZ told agents he had just picked up water for the illegal aliens staying in the trailer at Sugarbird and Hunnybird Lane. According to LOPEZ, he was working for a man he knew as Tacho who paid him \$20 (USD) to make sure the smuggled aliens had water.

DELGADO denied any involvement in alien smuggling.

Neither LOPEZ nor DELGADO were willing to grant consent to enter the trailers where the illegal aliens were being harbored, because they said they were not in charge of the trailers.

At approximately 5:45 p.m. FIT agents and Hidalgo County Constables approached the two trailers in an attempt to obtain consent to search for undocumented aliens. As agents were approaching the rear trailer where the informant said he stayed, approximately seven subjects attempted to abscond. Some were apprehended and some were able to abscond. All of the people apprehended were illegal aliens.

While agents were trying to round up the people who were attempting to abscond, it became very chaotic inside the trailer, because the occupants were running back and forth from window to window, looking for an opportunity to flee.

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FIT Agent J. Alvarado, who was standing outside and below the front door of the trailer, (the trailer was elevated) was speaking to Israel Nava-Mireles who was inside the trailer. Nava told Agent Alvarado he had been staying at the trailer for 9 days, and it was so crowded in the trailer, it was very difficult to move around. While speaking to Nava, another person who was inside the trailer, shoved an unidentified female out of the door and on to Agent Alvarado. Simultaneously, others began pushing their way out the door and windows. Approximately 15 additional subjects jumped out of any available window or door and attempted to abscond.

Agents entered the trailer due to the escalating threat of injury to both the agents and the illegal aliens who were still inside the trailer. Agents apprehended a total of 75 illegal aliens in and around the first trailer they approached. Approximately 20 suspected illegal aliens were able to successfully abscond.

CONDITION OF THE TRAILER:

The trailer was approximately 600-700 square feet and had no furniture. There was no electricity, and it was very hot inside the trailer. There was no running water in the restroom, and some of the smuggled aliens told agents they have refrained from defecating for up to five days due to the non-working state of the restroom. The smell of the restroom and trash throughout the house was overwhelming.

In the front trailer, agents found one illegal alien, and an air soft pistol, but they were not able to tie the subject into the alien smuggling activities, and he was not charged.

PRINCIPAL'S STATEMENT:

Both principals were read their rights on scene, and once at the station were approached about providing a written statement. LOPEZ stated he was willing to provide a statement, but DELGADO did not want to speak to agents any further.

LOPEZ told agents he was on his way back to the trailer to deliver water to the illegal aliens staying there. According to LOPEZ he has been to the trailer several times before, and was paid \$20 (USD) to take water to the people staying there. He admitted he knew the people staying there were illegal. In addition to taking water to the people, he was paid \$100 (USD) per person he transported north. LOPEZ stated he has made approximately 7 trips north with approximately 5 illegal aliens in each trip. LOPEZ would drop off the illegal aliens on the south side of the Highway 77 checkpoint and let them walk around. A man named Tacho was in charge of paying him.

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ADDITIONAL ORAL STATEMENTS MADE BY LOPEZ:

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